



January 22, 2024

Via ECF

Hon. Anne Y. Shields
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Government Employees Insurance Company, et al. v. Harbor Medical Group, P.C.,
et al. (EDNY), Index No.: 2:23-cv-09038-JMA-AYS***
Letter Motion for an Extension of Time

Dear Judge Shields:

We represent Defendant Daniel Kandhorov (“Defendant”) in the above-referenced action. We respectfully submit this letter requesting an extension of time for Defendant to answer, move or otherwise respond to Plaintiffs’ complaint (the “Complaint”), to March 5, 2024.

Plaintiffs’ counsel has consented to this request. A stipulation memorializing the extension is attached here as Exhibit A. This is Defendant’s first request for an extension of time.

Based on the foregoing, Defendant respectfully requests that the stipulation be so ordered, granting Defendant’s request for extension to the deadline to answer, move, or otherwise respond to the Complaint to and including March 5, 2024.

Respectfully submitted,

Leo Jacobs

cc: all counsel of record (via ECF)

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE COMPANY,
GEICO INDEMNITY COMPANY, GEICO GENERAL INSURANCE
COMPANY and GEICO CASUALTY COMPANY,

2:23-cv-09038

Plaintiffs,

-against-

HARBOR MEDICAL GROUP, P.C., CONFIDENT MEDICAL
SERVICES, P.C., COASTAL MEDICAL, P.C., ALEXANDR
ALEXEEVICH ZAITSEV, M.D., MARK KAMINAR,
ANTHONY BENEVENGA, FINANCIAL VISION GROUP, LLC,
FINANCIAL VISION GROUP II, LLC FORMERLY KNOWN
AS ADF EQUITIES, LLC, FINANCIAL VISION GROUP III, LLC,
FINANCIAL VISION GROUP IV, LLC, DANIEL KANDHOROV,
AND JOHN DOE DEFENDANTS NOS. 1-5.

Defendants.

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IT IS HEREBY STIPULATED AND AGREED by and between the undersigned
counsel for Plaintiffs GOVERNMENT EMPLOYEES INSURANCE COMPANY, GEICO
INDEMNITY COMPANY, GEICO GENERAL INSURANCE COMPANY and GEICO
CASUALTY COMPANY (“Plaintiffs”) and Defendant DANIEL KANDHOROV
(“Defendant”) that Defendant’s time to answer, move or otherwise respond is hereby
extended to and including Tuesday, March 5, 2024 (the “Extension”).

IT IS FURTHER stipulated and agreed that:

- a) this is the first time an extension has been requested by Defendant;
- b) no other dates pursuant to this Court’s order are affected by this Extension;
- c) Defendant waives any affirmative defense based on lack of personal
jurisdiction based on service of process.

IT IS FURTHER stipulated and agreed that this stipulation may be executed in

counterparts and facsimile and electronic copies may be deemed as original for purposes of execution and filing.

Dated: January 22, 2024
New York, New York

RIVKIN RADLER LLP

By: /s/ Barry I. Levy

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JACOBS P.C.

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